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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 | ARTHUR LEE ALFRED, II et al.,

Case No. 2:18-CV-08074-CBM-ASx

13 || Plaintiffs.

**DECLARATION OF ROBIN S.
GRAY IN SUPPORT OF
DEFENDANT WALT DISNEY
PICTURES' MOTION FOR
SUMMARY JUDGMENT**

14
15 v.
WALT DISNEY PICTURES.

Date: October 19, 2021
Time: 10:00 a.m.
Dept: Courtroom 8B

Judge: Hon. Consuelo Marshall

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DECLARATION OF ROBIN S. GRAY

I, Robin S. Gray, hereby declare:

3 1. I am admitted to practice before all of the courts of the State of
4 California and this Court. I am an attorney at the law firm of Munger, Tolles &
5 Olson LLP and counsel of record for Defendant Walt Disney Pictures in the above-
6 captioned matter. I have personal knowledge of the facts set forth in this
7 declaration, and, if called as a witness, I could and would testify competently to the
8 matters set forth herein

9 2. Attached here as **Exhibit A**, and lodged in physical format with the
10 Court as described in the concurrently filed Notice of Lodging, is a true and correct
11 copy of the 2003 motion picture *Pirates of the Caribbean: The Curse of the Black*
12 *Pearl*.

13 3. Attached here as **Exhibit B** is a true and correct copy of excerpts of the
14 transcript of the deposition of Plaintiffs' expert David Román, which was taken on
15 May 27, 2021 and August 18, 2021.

16 4. Attached here as **Exhibit C** is a true and correct copy of excerpts of the
17 transcript of the first day of the deposition of Defendant's expert James McDonald,
18 which was taken on June 16, 2021.

19 5. Plaintiffs attached a copy of their *Pirates of the Caribbean* screenplay
20 (the “Screenplay”) as an exhibit to their original complaint. *See* ECF No. 1-1. I
21 have read and am familiar with the contents of the Screenplay.

22 6. Additionally, I have watched the footage of the Pirates of the Caribbean
23 theme park ride that is being submitted as exhibits to the concurrently filed
24 declarations of David Jessen (Exhibit A) and Diego Parras (Exhibit B), and I have
25 reviewed *The "E" Ticket* magazine issue published in Fall 1999 about the Pirates of
26 the Caribbean theme park ride.

1 7. For the Court's convenience, I have prepared a summary table showing
2 where material from the Pirates of the Caribbean ride appears in the Screenplay.
3 That table is attached here as **Exhibit D**.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed on this 7th day of September, 2021, at Los Angeles, California.

Robin Gray
Robin S. Gray